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TRINITY COUNTY

BOARD OF SUPERVISORS
P.O. Drawer 1613 (530) 623-1217
WEAVERVILLE, CALIFORNIA 96093
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Jeannie Nix-Temple, County Administrative Officer

September 7, 1999

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: CALFED Programmatic EIS/EIR, June 1999 Draft

Dear Mr Breitenbach:

Trinity County submits the following comments on the draft EIS/EIR's treatment of Trinity River issues.

1. The Cumulative Impacts section of Attachment A (p. A-41) notes that the Central Valley Project Improvement Act (CVPIA) orders the development of in-stream flow recommendations for the Trinity River, but fails to mention that CVPIA (Section 3406(b)(23)) also orders that the flow recommendations be "implemented accordingly". We request that this pertinent information be included.

2. Attachment A explains that (b)(2) water and refuge water supplies are modeled as baseline "existing conditions" because they were explicitly mandated by CVPIA. However, the Trinity River instream flow recommendations are not treated as part of the baseline even though CVPIA explicitly directs that they be "implemented accordingly". If explicit CVPIA direction is the criterion for inclusion in baseline modeling, the recommendations from the Trinity River Flow Evaluation Report should be included as a baseline existing condition. If other or additional criteria are used, they should be identified, and/or the (b)(2) and refuge water supplies should be based on existing conditions, not CVPIA mandates which have not yet been fully implemented.

3. Page A-19 notes that for the modeling assumptions for "Criterion A" in the No Action Alternative, "Trinity River minimum fish flows below Lewiston Dam are in accordance with Reclamation's Draft CVPIA PEIS (maximum flow requirement 750 TAF/year)." The CVPIA PEIS Attachment G6 gives a range of flows from 392,000 af to 752,000 af for the Trinity River Flow Schedule, based on 5 water year types. The weighted average Trinity River flow release under that regime is 542,429 af. Please be aware that the flow schedule included in the CVPIA PEIS was superseded several years ago; the final Trinity River Flow Evaluation Report recommends a range of flows based on 5 water year types with a maximum in-stream release (in extremely wet years) of 815,000 acre feet and a minimum of 368,000 af in critically

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dry years. The weighted average is 594,500 af. Thus, the figures used by the Draft /CALFED PEIS/EIR understate the final Flow Evaluation Report recommendations by 52,071 AF/year, using the weighted average of recommended instream releases in various water-year types.

4. Public Law 105-44, signed into law by President Clinton on September 30, 1997, changed the name of Claire Engle Lake to Trinity Lake. Remaining references to Claire Engle Lake should be changed to "Trinity Lake" or "Trinity Lake (formerly Claire Engle Lake)". The reference to "Claire Eagle Lake" on page A-40 may be especially confusing to readers.

5. Page A-18 notes that under Scenario B, existing Trinity River instream flows are 340 TAF "based on a May, 1991 letter agreement between Reclamation and USFWS." The document should note that existing Trinity River Flows of 340 TAF are also based on Section 3406(b)(23) of CVPIA.

Thank you for your consideration of these comments.

Sincerely,

TRINITY COUNTY BOARD OF SUPERVISORS

Robert Reiss, Chairman

Attachments: 1. Attachment G6 from CVPIA PEIS
2. Table ES2 from Trinity River Flow Evaluation- Final Report

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Attachment G6

MINIMUM INSTREAM FISHERY RELEASES FOR TRINITY RIVER

The following release schedule for Trinity River was developed by the Service for use in the Draft PEIS alternatives on April 26, 1995.

Flow alternative assumes a restored channel configuration, channel morphology (maintenance), riparian innundation and dessication (and seed dispersion), sediment transport, rearing, overwintering, and redd separation.

Water Year	Wet		Above Normal		Below Normal		Dry		Critical	
Exceedence>	0.25		0.50		0.70		0.90		<0.90	
TRD INFLOW	1,600,000		1,050,000		850,000		600,000		<600,000	
Week										
01 Oct	275		225		200		200		200	
08 Oct	300		250		225		225		225	
16 Oct	350		275		250		250		250	
23 Oct	400		300		300		300		300	
30 Oct	450	337	325	265	325	248	325	248	325	248
06 Nov	450		350		350		350		350	
13 Nov	500		375		350		350		350	
20 Nov	500		400		400		400		400	
27 Nov	500	480	425	373	499	364	400	364	400	364
04 Dec	500		450		400		400		400	
11 Dec	500		475		450		450		400	
18 Dec	500		500		45v		450		400	
25 Dec	500	500	500	476	450	434	450	434	400	400
01 Jan	600		500		450		450		450	
08 Jan	600		500		450		450		450	
15 Jan	600		500		450		450		450	
22 Jan	600		500		450		450		450	
29 Jan	600	600	500	500	450	450	450	450	450	450
05 Feb	600		500		450		450		450	
12 Feb	600		500		450		450		450	
19 Feb	600		500		450		450		450	
26 Feb	600	600	500	500	450	450	450	450	450	
05 Mar	600		600		500		500		500	
12 Mar	650		600		500		500		500	
19 Mar	700		600		500		500		500	
26 Mar	750	663	600	587	500	494	500	494	500	494
02 Apr	800		800		700		600		600	
09 Apr	850		800		700		600		600	
16 Apr	900		800		700		600		600	
23 Apr	1,000		800		800		600		600	
30 Apr	1,500	903	1,000	800	1,000	727	800	603	800	603
07 May	2,000		2,000		1,500		1,000		2,000	
14 May	4,000		5,200		2,000		1,500		2,000	
21 May	8,500		5,200		4,500		4,500		2,000	
28 May	3,750	4,048	3,000	3,381	2,000	2,258	1,750	1,961	2,000	1,768
04 Jun	3,500		2,500		1,500		1,500		2,000	
11 Jun	3,000		1,500		1,200		1,000		750	
18 Jun	2,500		1,000		1,000		850		600	
25 Jun	2,000	2,875	900	1,647	750	1,213	650	1,087	500	1,082
02 Jul	1,500		650		550		450		450	
09 Jul	1,000		500		400		300		300	
16 Jul	700		400		300		275		250	
23 Jul	500		350		300		250		250	
30 Jul	400	926	300	477	250	390	200	322	200	311
06 Aug	350		300		250		200		200	
13 Aug	300		300		250		200		200	
20 Aug	275		275		225		200		200	
27 Aug	250	314	250	286	200	236	175	196	175	196
03 Sep	225		225		200		175		175	

Water Year	Wet		Above Normal		Below Normal		Dry		Critical	
Exceedence>	0.25		0.50		0.70		0.90		<0.90	
TRD INFLOW	1,600,000		1,050,000		860,000		600,000		<600,000	
Week										
10 Sep	200		200		175		150		150	
17 Sep	200		200		200		150		150	
24 Sep	250	221	200	209	200	194	175	183	175	183
Total	752,252		573,804		449,757		408,177		393,276	

Table ES2. Recommended annual water volumes for instream release to the Trinity River in thousands of acre-feet (TAF), probability of occurrence, and Trinity Reservoir inflow thresholds.

Water-Year Class	Instream Volume (TAF)	Trinity Reservoir Inflow (TAF)	Probability of Occurrence
Extremely Wet	815.2	>2,000	0.12
Wet	701.0	1,350 to 2,000	0.28
Normal	646.9	1,025 to 1,350	0.20
Dry	452.6	650 to 1,025	0.28
Critically Dry	368.6	<650	0.12
Average (weighted by water-year probability)	594.5		

prevents riparian encroachment along the low-flow channel and provides suitable temperatures for chinook salmon smolts, which outmigrate later in the year than other salmonid species. A 36-day, 1,500-cfs "bench" during Critically Dry water years will discourage seedling germination on alternate bar flanks through inundation and provide some temperature benefits for outmigrating chinook salmon smolts. The rate of change for the descending limbs of the snowmelt hydrographs mimics natural receding snowmelt hydrograph rates.

Because of the long outmigration period for the three salmonid species combined, a variety of outmigrant temperature conditions are necessary throughout the spring/summer hydrographs. Recommended releases for Extremely Wet, Wet, and Normal water years provide optimal salmonid smolt temperatures (Table ES4). Marginal smolt temperatures will be provided throughout much of the outmigration period during Dry and Critically Dry water years. The lower releases during these year classes will allow mainstem water temperatures to warm earlier in the outmigration period, which will cue salmonids to outmigrate (warming temperatures are an important physiological signal to begin smoltification and outmigration) before water temperatures in the lower watershed are likely to become too warm to insure smolt survival. Following smolt temperature control releases, 450 cfs releases will be maintained to provide suitable temperature regimes for holding and spawning adult spring-run and fall-run chinook (Table ES5).

Channel Rehabilitation

Channel-rehabilitation activities are recommended along the mainstem Trinity River from Lewiston Dam to the North Fork Trinity River confluence. The intent of channel rehabilitation is to selectively remove the fossilized riparian berms (berms that have been anchored by extensive woody vegetation root systems and consolidated sand deposits) and recreate alternate bars. Channel rehabilitation is not intended to completely remove all riparian vegetation, but to remove vegetation at strategic locations to promote alluvial processes necessary for the restoration and maintenance of salmonid populations. The tightly bound berm material is hard to mobilize even at high flows, and mechanical berm removal is necessary. After selected berm removal, subsequent high-flow releases and coarse sediment supplementation will maintain these alternate bars and create a new dynamic channel. Specific channel rehabilitation recommendations vary by river segment between Lewiston Dam to the confluence of the North Fork Trinity River because the needs of channel rehabilitation change with tributary inputs of flow and sediment.